



69-06 Grand Avenue, 3rd Floor
Maspeth, New York 11378

Manhattan Office
110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office
One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office
1515 Market Street, Suite 1200
Philadelphia, Pennsylvania 19102

Boston Office
225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office
300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Arjeta Albani, Esq.
arjeta@employeejustice.com

January 24, 2025

VIA ECF

Honorable Margaret M. Garnett
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Robles v. Highlife Health, LLC
1:24-cv-08447

Dear Judge Garnett:

We represent Plaintiff, Primitivo Robles in the above-referenced matter brought pursuant to the Americans with Disabilities Act (“ADA”). We write now, jointly with Defendant’s counsel, to respectfully submit this letter in response to the Court’s Order dated November 18, 2024.

The parties have engaged in multiple substantive and productive settlement discussions, and we believe that a settlement is likely in the near future. To that end, the parties would jointly respectfully request that the Court stay all proceedings and deadlines for thirty days during which the parties intend to continue settlement negotiations. If the parties are unable to come to a resolution within this time, we will advise the Court and proceed with litigation.

Should the Court decline to stay proceedings for thirty days, Defendant will submit an answer, and the parties would jointly respectfully request referral to the Court’s mediation program.

We thank the Court for its time and attention in this matter.

Sincerely,

GRANTED. All pending dates and deadlines, including any deadline by which Defendant must respond to the Complaint, are hereby STAYED. If the parties have not settled this matter by **February 24, 2025**, they are ORDERED to submit a joint letter informing the Court whether they still believe mediation would be beneficial to resolving the claims asserted herein or whether they would prefer to proceed with an Initial Pretrial Conference.



Arjeta Albani, Esq.
Attorney for Plaintiff
110 East 59th Street, Suite 2300
New York, New York 10022
Tel. No.: (212) 791-5396
Fax No.: (212) 406-6890
arjeta@employeejustice.com

SO ORDERED. Dated January 24, 2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

c.c.

Justin T. Kelton, Esq.

Jkelton@abramslaw.com

Counsel for Defendant